

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

JULIE M. PICKLE
f/k/a JULIE M. WOOD,
Debtor

DELTA BOROUGH MUNICIPAL AUTHORITY,
Movant

vs.

JULIE M. PICKLE,
Respondent

Chapter 13

Case No. 1:17-bk-00467-RNO

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

COMES NOW, this 21st day of April, 2017, Delta Borough Municipal Authority, by and through its attorneys, CGA Law Firm P.C., Brent C. Diefenderfer, Esquire, and respectfully represents the following:

1. Movant is Delta Borough Municipal Authority, 101 College Avenue, P.O. Box 278, Delta, Pennsylvania 17314. Movant is represented by CGA Law Firm, Brent C. Diefenderfer, Esquire, 135 North George Street, York, Pennsylvania 17401.

2. The Respondent is the within Debtor, Julie M. Pickle (hereinafter "Debtor"). Debtor is represented by Cynthia E. Reed, Esquire, 8 North Queen Street, Suite 700H, Lancaster, Pennsylvania 17603.

3. Charles J. DeHart, III Esquire (hereinafter "Trustee"), has been duly appointed and qualified to act as the Trustee in the within bankruptcy case and maintains an office at 8125 Adams Drive, Suite A, Hummelstown, Pennsylvania 17036.

4. Movant anticipates filing a Proof of Claim for pre-petition arrears in the amount of \$268.79. As Debtor's Chapter 13 Plan proposes to pay Movant \$134.23, Movant objects to the confirmation of the Plan as it appears to be underfunded as to the claims to be paid.

WHEREFORE, Delta Borough Municipal Authority objects to the confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

CGA Law Firm P.C.

/s/Brent C. Diefenderfer, Esquire

Brent C. Diefenderfer Esquire

Supreme Court No. 93685

135 North George Street

York, Pennsylvania 17401

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CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on April 21, 2017, a true and correct copy of the attached Objection was served upon the following parties in the following manner:

Name	Mode of Service
Charles J. DeHart, III, Chapter 13 Trustee	Via CM/ECF
Cynthia E. Reed, Esquire	Via CM/ECF

I certify under penalty of perjury that the forgoing is true and correct.

Date: 04/21/2017

/s/Brent C. Diefenderfer, Esquire
Brent C. Diefenderfer Esquire